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VIA ELECTRONIC AND US MAIL

Judge Paul Gardephe
US District Judge
40 Foley Square
New York NY 10007

**RE: LETTER IN OPPOSITION TO DOUGLAS SENDEROFF MOTION IN
OPPOSITION AND IN FURTHER SUPPORT TO REOPEN CASE**

Dear Judge Paul Gardephe:

This Letter is being submitted in direct opposition to Douglas Senderoff, through his unethical counsel Justin Mercer of Lewis & Lin LLC, of their motion in opposition to, and in further support to reopen this case.

Douglas Senderoff by and through his counsel (now named as co-defendants) is the very definition of harassment, vexatious litigation, improper purpose, dilatory unethical tactics, forum shopping, ghostwriting, illegal delay tactics, unexcused failure to answer or appear pursuant to valid service of process, and conduct that the federal and state sanctions/contempt laws are supposed to squarely address.

This man Douglas Senderoff ignored duly served court orders to physically appear and answer in both NYS Supreme Court in case index no 101501/2018 as well as this court index no 1:18-CV-11092-PGG, going back as far as October and November 2018, put in a one line answer in January 2019 to this court where he feigned to want nothing to do with the case that he himself began with his extortionate demand letter dated October 5, 2018, which was the very subject matter that prompted Plaintiff Rahul Manchanda to institute this lawsuit.

Plaintiff Rahul Manchanda instituted that lawsuit in NYS Supreme Court index no 101501/2018 in October 2018 against Douglas Senderoff and other named Defendants because he had evidence to

show and to prove that he was the victim, not the other way around.

Rather than appear in court, or respond/litigate these matters, Douglas Senderoff resorted to physically hiding, dodging/evading service of process, lying to various judges and 2 courts, communicating with fellow opposing counsel to strategize his evasion of legitimate court process and procedure, and plan his March 2019 surreptitious lawsuit index no 152538/2019 in NYS Supreme Court dealing with the exact same subject matter which Plaintiff Rahul Manchanda originally brought in October 2018.

Plaintiff Rahul Manchanda spent tens of thousands of dollars on said original NYS Supreme Court lawsuit index nos 101501/2018 and SDNY removed lawsuit 1:18-CV-11092-PGG, money that he will never see again, and subjected both himself and his family, pregnant new wife, business, friends, colleagues, expert witnesses, and this honorable court to untold stress and exertion in order to get final justice and an end to Douglas Senderoff and his other co-defendants' harassment for many years.

Even a high school student can see the depths of legal and ethical depravity that both Douglas Senderoff and his counsel are now swimming in.

Indeed Plaintiff Rahul Manchanda's protest letter dated February 2, 2019, thankfully immortalized underscores this immense frustration that Plaintiff Rahul Manchanda has been going through with not only Douglas Senderoff and his counsel, but with the other named co-defendants and his own lawyer Dominic Sarna, who convinced him to set aside his claims while Plaintiff Rahul Manchanda was literally on the wedding altar and at a wedding party with his close friends/family on February 1 and February 2, 2019, while opposing counsel Corey Cohen proceeded to "white out" a formally signed and notarized document that Plaintiff Rahul Manchanda had signed, subject to the requirement that Douglas Senderoff would also agree to sign off on, foregoing any and all claims moving forward.

The heights of improper and unethical conduct emanating from Douglas Senderoff, his counsel, the other co-defendants, and their opposing counsel cry out for intervention and justice from this court.

Indeed Plaintiff Rahul Manchanda even prepared and filed 3 separate motions for sanctions/contempt and motions to compel answers/appearance against Douglas Senderoff and the other co-defendants to formally protest and demand relief for their extreme delay tactics, dishonest and unethical protraction of this litigation, ghostwriting techniques, contumaciously avoiding court appearances and hearings in 2 separate court forums, forum shopping, avoiding answering a summons and complaint for which they only get 20 days, not 6 months, thereby increasing the

chances of witness and evidence tampering, improper methodologies to change the facts/law of this litigation, and other problems.

Instead Douglas Senderoff and his counsel are banking on how stupid they think Plaintiff Rahul Manchanda is, as well as this Court and the NYS Supreme Court.

As previously reported to this court, on or about February 2, 2019 undersigned lodged and mailed his protest to the resolution of this case, while he was getting married on February 1 and had his wedding party on February 2, which his lawyer Dominic Sarna knew about, in all the chaos his lawyer Dominic Sarna kept trying to prevent undersigned from protesting against the flagrant bullying and manipulation of undersigned to accept a situation that he did not want, witnessed by hundreds of people.

All the while undersigned Plaintiff Rahul Manchanda suspected the backroom dealings and dishonest machinery behind the scenes involving his own lawyer Dominic Sarna, Douglas Senderoff and opposing counsel which he was never privy to.

Now on March 21, 2019 undersigned Plaintiff Rahul Manchanda was sued/served with a separate dishonest lawsuit in NYS Supreme Court index no 152538/2019 for the same exact claims by Douglas Senderoff, while undersigned lawyer Dominic Sarna simply laughed about it.

To that end undersigned would like to strenuously object as he has been totally manipulated and bamboozled by these people, as well as now this Honorable Court and now the NYS Supreme Court again, three times by Douglas Senderoff and his counsel Justin Mercer of Lewis & Lin LLC.

Respectfully submitted,



Rahul Manchanda, Esq.